

Makarow, Irina (OCD)

From: Brian Carpenter [briancarpenter@rebound-bctc.org]
Sent: Thursday, October 18, 2001 8:37 AM
To: efsec@ep.cted.wa.gov
Subject: comments on SEIS for SE2

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ENERGY FACILITY SITE
EVALUATION COUNCIL

REBOUND's comments are as follows:

With the SEIS and the accompanying mitigation, the proposed project so far exceeds current environmental regulations and standard practice as to make it the cleanest power plant ever proposed in Washington, Oregon, Idaho or British Columbia.

EFSEC's approval of the project as currently configured would set a new standard of environmental excellence for all future power plants proposed in Washington State.

Specifically,

SE2's proposed NOx mitigation and CO2 mitigation is precedent setting and goes far beyond what any other power plant is proposing. EFSEC has recently permitted power plants that will be dirtier and involve less mitigation than SE2 is proposing. Specifically, the CO2 mitigation proposed by SE2 goes far beyond what may come out of the yet-to-be-determined CO2 mitigation plans to be proposed by Duke Energy and Tractebel. Instead of vague goals and promises, we will see a clear

financial mitigation payment. The NOx mitigation proposed by SE2 is different than that proposed by Duke and Tractebel, who recently received permits from EFSEC. Neither Duke nor Tractebel proposed any NOx mitigation. SE2's emission limits would also be lower than those proposed for Duke and Tractebel. If EFSEC wishes to push CO2 mitigation, which appears to be the case, and if EFSEC wishes to push for lower emission limits, it should approve SE2 and set a new standard of excellence for future power plants.

The decision to remove diesel burning from the project will reduce emissions from the plant, specifically SO2 and PM10.

On the water quality/quantity issue, again SE2 has gone far beyond what is being done by other power plants. Most plants proposed in Western Washington have taken advantage of the public perception that water is endless and can be used in any quantity without impacts. SE2 has reduced its water use dramatically through a unique wet/dry cooling system that has never been proposed in Washington until now. This action by SE2 will dramatically reduce water usage when compared to plants of similar size in Washington and Oregon.

SE2's proposal to monitor wells and to install a water treatment facility if nitrate levels exceed regulatory thresholds is also above and beyond the normal corporate commitment.

In summary, SE2's actions and the SEIS present EFSEC with the cleanest proposal it has ever faced. EFSEC must approve this project. Any other decision will send a message to future power plant developers: you don't have to be environmentally sensitive, you don't have to propose real mitigation, you don't have to respond to your critics, you just have to build somewhere where people won't complain.

Thank you for the opportunity to comment on this project.

Brian Carpenter
Research Analyst